

**IN THE CIRCUIT COURT OF THE CITY OF ST. LOUIS  
STATE OF MISSOURI**

DANIELLE DAVIS,	)	
	)	
Plaintiff,	)	
	)	Cause No.:
v.	)	
	)	Division No.:
MELISSA BARTMAN,	)	
	)	
SERVE: 196 E. Burlington Street	)	
Riverside, IL 60546	)	Personal Injury
	)	In Excess of \$25,000.00
Defendant.	)	PLAINTIFF DEMANDS TRIAL BY JURY

**PETITION**

COMES NOW Plaintiff Melissa Bartman, by and through the undersigned counsel, Mandel, Mandel, Marsh, Sudekum & Sanger, and for her cause of action against Defendant Melissa Bartman, hereby states and alleges as follows:

1. Plaintiff Danielle Davis (“Plaintiff”) is an individual and a resident of the City of St. Louis, State of Missouri.
2. That at all material times herein, Defendant Melissa Bartman (“Defendant”) was an individual and a resident of the State of Illinois.
3. That venue is proper in this Court under RSMo 508.010.4 in that the acts complained of occurred in St. Louis City, State of Missouri.
4. That on or about July 21, 2023, Plaintiff was operating a motor vehicle southbound on Tucker Road, at the intersection of Clark Street, both open and public roadways in the City of St. Louis, State of Missouri.
5. At said time and place, Defendant, travelling northbound on Tucker Road, attempted to

make a left turn onto westbound Clark Street, striking Plaintiff's vehicle.

6. That as a result of the collision, Plaintiff was caused to sustain serious injuries hereafter described.

7. That Plaintiff's injuries were due to the negligence and carelessness of Defendant in one or more of the following respects to-wit:

- a. Defendant travelled at excessive speed;
- b. Defendant failed to yield right-of-way;
- c. Defendant failed to keep a careful lookout;
- d. Defendant violated the traffic signal;
- e. Defendant knew or by the highest degree of care could have known that there was a reasonable likelihood of collision in time thereafter to have stopped, or/and swerved, or/and slackened speed, but Defendant failed to do so.

8. That as a direct and proximate result of the aforesaid negligence and carelessness of Defendant, Plaintiff Danielle Davis was caused to suffer injuries to-wit: severe and permanent injuries including but not limited to injuries to her neck, back and spine, including but not limited to the muscles, ligaments, and tendons thereof; reasonable and necessary medical expenses and additional medical expenses in the future; economic damages in the form of lost wages in an amount to be determined; and non-economic damages as a result of his injury, permanent condition and ongoing limitations, restrictions, swelling, soreness, and pain and suffering. That Plaintiff's injuries are serious, painful and disabling and will continue to be so in the future. That she will endure future pain and incur probable future expense.

WHEREFORE, Plaintiff Danielle Davis prays judgment against Defendant Melissa

Bartman in an amount in excess of \$25,000.00 that is fair and reasonable, together with her costs herein expended and such further relief that the Court deems just and proper.

Respectfully submitted,

MANDEL, MANDEL, MARSH  
SUDEKUM & SANGER

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